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ABSTRACT

In the present paper, the author restricts himself to three major questions regarding accrediting of colleges and universities: (1) Ought there to be some form of accreditation, voluntary or otherwise? (2) If there is to be some form of accreditation, what is the future of voluntary associations in this effort? and (3) If there is to be some form of accreditation and if not by voluntary associations, then by whom or what? The arguments presented to the first question seem to deny that accreditation as it now exists should be allowed to continue. Reasons for this feeling center around the facts that: (1) very few colleges have any trouble at all getting themselves accredited, regardless of the quality of educational output; (2) the pursuit of excellence is not advanced by accrediting procedures; (3) there is no further need for accrediting agencies because only 80 nonregionally accredited institutions are in existence; and (4) accreditation merely contributes to educational sameness between and among institutions rather than promoting quality education. Discussions of the arguments surrounding the other two questions are considered in the text of the document. (HS)

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PRESENTATION

at

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# THE FUTURE OF VOLUNTARY ACCREDITATION

by

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The topic as it is assigned to me poses at least six separate but related questions: What is the future of voluntary accreditation? Does voluntary accreditation have a future? Ought voluntary accreditation to have a future? What is the future of accreditation, voluntary or otherwise? Is there a future for accreditation, voluntary or otherwise? Ought there to be a future for accreditation, voluntary or otherwise? And I am sure that there are still other possible variations on the same theme. For the purposes of this paper I want to restrict myself to the following questions and in the following order: (1) Ought there to be some form of accreditation, voluntary or otherwise? (2) If there is to be some form of accreditation, what is the future of voluntary associations in this effort? (3) If there is to be some form of accreditation and if not by voluntary associations, then by whom or what?

## OUGHT THERE TO BE SOME FORM OF ACCREDITATION?

At the annual meeting in 1931 of the North Central Association, one of what is now six regional general accrediting associations, Samuel P. Capen, then Chancellor of the University of Buffalo, was asked to speak on "The Principles Which Should Govern Standards and Accrediting Practices." After fairly lengthy introductory remarks, Chancellor Capen announced the major point of his address:

> What principles should govern accrediting practices? My answer is no principles. I believe there should no longer be any accrediting practices. If tomorrow morning every accrediting committee in the country should adjourn sine die and every accredited list should be destroyed, I believe American Education would receive such a stimulus as it has not received in a dozen years. There has been but one justification for accrediting and that is educational malpractice, deliberate or

> unconscious. I do not see that this has entirely disappeared. But I do maintain that it has been so greatly reduced as to require no such elaborate and costly--yes, and tyrannical--machinery as the existing accrediting system to keep it under control. The pirates and buccaneers have been swept from the seas. It takes no very ponderous armament to deal with an occasional picaroon. /Samuel P. Capen, "The Principles Which Should Govern Standards and Accrediting Practices," The North Central Association Quarterly, VI (December, 1931), pp. 340-341/

Chancellor Capen's answer to my question, "Ought there to be some form of accreditation?" was on March 18, 1931 a resounding, "No!" Even if there had once been a need, it was clear that in 1931, not only had accrediting agencies outlived their usefulness, but they were actually inhibiting the proper developments of American higher education.

Mr. Capen would not, however, nail shut the doors on all the offices of the accrediting agencies. He did find a residual role for the agency secretaries. He went on to say:

> Because I am not quite a nihilist I have a substitute for current accrediting practices to propose. I propose that every regional and national body now engaged in accrediting establish in place of this accrediting machinery a sanitary commission. The function of such a commission would be to investigate any institution thought to be unsound or dishonest and give the findings wide publicity. As a corrective of errors or a deterrent to fraud such a procedure would be quite as efficacious as the present accrediting procedure. /Ibid., p. 341/

It may be that the good chancellor was hedging a bit, because he apparently still found a public need that ought to be met, i.e. the public should in some manner be protected from gross dishonesty. Perhaps this more limited role is something short of accrediting; at least institutions not clearly in violation of accepted standards would not be subject to periodic review and examination--or periodic harassment and the imposition of highly questionable standards, as Mr. Capen would say.

Eight years later Chancellor Capen was even more forceful as he argued in his address, "Seven Devils in Exchange for One," against the

multiplicity of accrediting agencies, the cost of their operations, and more pointedly against the standards employed and the manner in which the standards were being applied. He said that accrediting agencies place too much emphasis upon things and money and not enough emphasis on the quality of the product /Samuel P. Capen, "Seven Devils in Exchange for One," Coordination of Accrediting Activities, American Council on Education Studies, Series I, No. 9. Washington, D.C.: The American Council on Education, 1939, pp. 5-17/.

When invited to submit an article for a symposium on accrediting in 1960, Henry M. Wriston, President Emeritus of Brown University, replied instead with a letter which was subsequently printed with the symposium papers under the title, "The Futility of Accrediting." He stated that "the accrediting procedure does not protect us from wretched and fraudulent institutions" and that "the pursuit of excellence is not advanced by accrediting procedures." He went on to write:

> The undoubted values are offset by throwing the mantle of accreditation over institutions which barely deserve it, if at all. The stimulus to improvement arising from the effort to get accreditation is an external, indeed a superficial, influence. It has no perceptible relationship to the inner drive for excellence which marks a worthwhile institution. After accreditation is achieved, there is a strong tendency to slack off and revert to one's idols. /Henry M. Wriston, "The Futility of Accreditation," in Accreditation in Higher Education: A Symposium, Journal of Higher Education, XXXI (June, 1960), pp. 327-329/

Thus we have two distinguished American university presidents dismissing accreditation as having a sound basis for continuing on the American scene. And while much testimony could be drawn from writers between Capen and Wriston and after Wriston, I mention but one more critic.

William K. Selden, first Executive Secretary of the National Commission on Accrediting, and the one person who has written as much about accrediting as any one person or combination of persons, published just over a decade ago an article on the "Relative Unimportance of Regional Accreditation" in which he pointed out that virtually all colleges eligible for regional accreditation had already been accredited; he cited a study of the U.S. Office of Education showing that there were only eighty liberal arts, degree-granting, privately supported non-regionally accredited institutions. At least as far as four-year institutions were concerned, the accrediting job had been done. Selden observed:

> Further, the presidents of the strongest institutions generally are unenthusiastic about accreditation and consider it to be a nuisance, if not an unnecessary interruption of their more interesting and rewarding responsibilities. /William K. Selden, "Relative Unimportance of Regional Accreditation," School and Society, 90 (November 3, 1962), pp. 373-375/

And at a meeting of the Association of American Colleges a year ago another speaker proposed that the regional accrediting agencies go out of business and that their responsibilities be turned over to the federal and state governments. I recognize that his proposal did not include the request that there be no accreditation, but only that the job be taken over by some other agency.

Yet the accreditation process continues. We have seven higher commissions (Western Association has two commissions, one for junior colleges and one for senior colleges) in six regions concerned with overall evaluation. When I participated in the study of regional accreditation during 1970 /for summary, cf. Asa S. Knowles, "A Report on Institutional Accreditation in Higher Education," The North Central Association Quarterly, XLV (Winter 1971), pp. 279-281/ I found that the seven commissions listed

2,253 institutions affiliated in all categories, including a number listed as "Correspondents." The team estimated that during 1969 the commission reviewed at least 950 examining team reports. The most recent annual report at one of the regional agencies lists 605 accredited institutions, 68 recognized candidates for accreditation, and 81 correspondent institutions, or a total of 754 institutions, an increase of 28 from a total of 726 the year before. And during 1971 a total of 178 institutions were considered for accredited or pre-accredited status /North Central Association, Annual Report 1971: Commission on Institutions of Higher Education, Chicago: North Central Association, 1972, pp. 40/. In April 1972 the National Commission on Accrediting listed 33 agencies in as many professional fields recognized to grant professional and specialized accreditation, an additional five programs for which three of the 33 agencies could grant program accreditation and the seven commissions of the six regional agencies. /Reports, National Commission on Accrediting, No. XXII-1, April, 1972/. The Commissioner of Education, U.S. Office of Education, currently recognizes about 45 accrediting groups.

On the basis of present activity it appears that voluntary accrediting is very much alive. Accrediting committees did not adjourn sine die, as Samuel Capen suggested they do 41 years ago. But even he was a realist, and he later observed in his talk to the North Central Association that he was "under no illusions" that there would be an "early abandonment of the accrediting system," his own predilection to the contrary notwithstanding /Capen, op. cit., p. 34/

But why would such persons as Capen and Wriston, and to a degree, Selden, advocate the abandonment of accrediting? And why has, instead, the accrediting movement grown as it has? To start with the last named

first, William Selden in 1962 just did not see much work ahead for the regional agencies. At least, among the four-year, private liberal arts college, almost 90 percent were already accredited, and if such a high proportion were accredited, the distinction in quality between accredited and non-accredited had become almost meaningless. It was pointed out that seldom was an accredited college dropped--there were a few notable exceptions--and reports of review visits "mostly involve suggestions intended to help the college or university improve itself... (and) these reviews do not really involve accreditation..." /Selden, op. cit., p. 374/ Dr. Selden did, however, see that there was a place for an accrediting agency to work with some non-accredited junior colleges, specialized institutions, and graduate programs. He predicted more effort on the part of professional accrediting agencies than on the part of regional agencies.

President Wriston found that accrediting procedures did not protect from "wretched and fraudulent institutions," that among some accrediting attempts "the examination seemed...scandalously superficial," the stimulus of accreditation is "an external, indeed a superficial, influence," the accreditation of separate programs by professional agencies impairs the "integrity of institutions management," and if expanded would "emphasize statistical and mechanical 'standards' without giving adequate consideration to the total educational pattern." Indeed, the "accreditation process inevitably is driven to judgments which are essentially superficial, transient in their validity, and a drain upon time, energy, and resources that ought to be put into the real obligations of the college or university.... Accreditation seeks not only to compare apples with grapes, but both with camels and cod." /Wriston, op. cit., pp. 327-329/

Chancellor Capen found that the most detrimental aspect of the accrediting activity was that which led to the "standardizing" of institutional programs.

> The very excellence of the North Central Association and its high-mindedness are the most unfortunate of its qualities. By virtue of these qualities it has contributed more than any other agency to make standardizing respectable, perhaps to render it impregnable. And when I contemplate that prospect my heart sinks within me. /Capen, op. cit., p. 339/

Instead, argues Capen, the concern must be with "the intellectual achievement of individuals." He uses the word educational standards, and he says that educational standards are not concerned with time, space, money, mass, number, organization. They /educational standards/ "involve simply the results of the stimulation, the effort in the growth of individuals.... They are not applicable to institutions. They are applicable only to persons." /Capen, op. cit., p. 342/

Clearly neither Wriston nor Capen were unconcerned about the quality of education. Capen was even prepared to use the term "educational standards," but he despaired of accrediting agencies ever dealing with the educational achievement of individuals; he saw no place for standards as applied to institutions.

And in one form or another, the current arguments against accreditation revolve around the difficulty of obtaining any insight into individual achievement through the application to institutions of some more or less arbitrary measures. It is said that what is important is what happens to individuals, and accrediting agencies either will not or are unable to focus on individual achievement.

Does this mean that accreditation is both unnecessary and counter-productive? What is suggested in place of accrediting of institutions?

Is it the "accreditation" of individuals? This is what at least the second Newman report seems to suggest at one point. Establish examination centers and give individuals a chance to demonstrate achievement, irrespective of the means by which they attained that particular knowledge or skill. The College Level Examination Program is saying the same thing. It seems as though it would be possible to substitute "standardized examinations" for "standardized institutions." But then it becomes an open question whether the last state is better than the first. While college and university departments will accept, sometimes with reservations, advanced placement for college entrants, and CLEP for advanced standing, and the Graduate Record Examination for some measure of achievement, there are few departments prepared to accept any of these tests as being wholly adequate. No test meets the requirements of all departments. Standardized tests have to deal with the most common elements, and, depending upon the orientation of the department, only more or less attest to the learning that is most important. But if the standardized test becomes the most important, or sole measure of achievement, then the curriculum adjusts itself to preparing students to pass the standardized test. Standardization through the use of standardized tests may be even more far-reaching, and some of the same criticisms that are leveled against the accreditation of institutions and programs may be transferred to the standardized tests.

But why not do away with both standardized tests and certification of institutions through accreditation? Why not assess an individual on the basis of what he is able to do on the job? That is, afterall, the real test. But then, suddenly we find that we have come the full circle. The regional agencies came into existence because colleges were not prepared to accept graduates from just any high school. Writing a general article

on accrediting nearly 15 years ago, I observed:

> The North Central Association was called into being to meet some of the critical problems facing education in the Middle West as a result of the significant changes in...the educational enterprise.... (near) the turn of the century.... Established colleges, faced with applications for admission from graduates of a bewildering array of secondary schools, found themselves without standards by which to judge the qualifications of the applicants.
>
> At the same time, the striking growth among secondary schools led to the establishment of scores of new colleges, many of which were little more than secondary schools.... The North Central Association... early addressed itself to the problem of defining the secondary schools and of setting some standards by which to evaluate the programs in the secondary schools and colleges. /Allan O. Pinister, "Accreditation in the North Central Region," Accreditation in Higher Education, Washington, D.C.: U.S. Department of HEW, Office of Education, 1959, p. 52/

The Association of American Universities early tried to rate undergraduate schools. The professional agencies arose to guarantee that practitioners had appropriate training. The general public today increasingly seeks out ratings of colleges and universities. We even read about ratings of individual graduate departments! And the federal government asks for some assurance of quality of colleges before its various agencies will grant funds for building and programs and research. Add to all of which that in the last few years we have heard a good bit about something called "accountability." State legislatures want assurance that the institutions are using funds wisely, producing acceptable products.

To be sure, the rating of schools and departments, and the setting up of standards for state legislatures is not accreditation, or at least it does not seem to come under that label. Yet, some standards are established, some measurements are made, and some judgments of relative quality are produced. These activities sound suspiciously like some kind of accrediting or certifying process. I guess that what I am saying is that specially in a society in which there are so many institutions involved in providing so

many different kinds of post-secondary education--and we keep adding to the number--we are going to have some kind of rating or certifying process, whether we consciously desire it or not. I think it is unlikely that we will move wholly to certifying individuals through some state or national examination system; we shall ask for some certification of institutions as well. We shall likely say that individuals who seek to be certified must first complete the programs that are certified. I am not saying that ought to be, although personally I am not prepared to accept state or national examinations as a sole way of evaluating achievement. I am only saying that as a matter of public policy we are more likely to continue with some measure of institutional and program accreditation, even with our current expressions of interest in "non-traditional" educational programs. And as long as we seek to certify institutions and programs, we are in some kind of accreditation process.

Within the last few months the U.S. Office of Education has called for and provided funds for a study that would evaluate the federal government's relationship to accrediting agencies. The study will be conducted by the Brookings Institution of Washington, D.C., and will seek to evaluate the government's reliance on various accrediting agencies determining institutional eligibility for various forms of funding. This does not sound as though the federal government is going to dismiss accreditation.

A grass-roots approach to the issue of accreditation was taken by the American Association for Higher Education in March 1972, when the membership of the Association was asked to respond to a series of questions, one of which dealt with accreditation. Just over 60 percent of those responding said that regional agencies needed "drastic revision" or should

be eliminated. But the response was not quite as strong as it sounds, since only 10 percent said that the agencies should be eliminated; 50 percent asked for drastic revision. Forty percent of those responding said that the agencies were presently doing a good job.

At the same meeting, in a paper on "Problems in Institutional and Specialized Accreditation," William Selden said that the possibility of removing all controls and doing away with accreditation entirely was "totally impractical." He noted that the question of whether or not there should be accreditation will continue and that there will be need for repeated analysis of the purpose and process of accreditation, but he went on to say that "those who advocate its complete abolition are, as I have already implied, unrealistic. One must ask--why should educators be more capable of self-control than those engaged in any other occupation or profession?" /William K. Selden, "Problems in Institutional and Specialized Accreditation," Paper prepared for presentation at the Annual Meeting of the American Association for Higher Education, Chicago, Illinois, March 7, 1972/

Ought there to be some form of accreditation, voluntary or otherwise? I expect that the question becomes transformed into, "Will there be some form of accreditation, voluntary or otherwise?" And so far as I am able to look to the future, I see more efforts at accreditation rather than fewer efforts. And I find our logic twisted around to say that since there <u>is</u> so much activity in accrediting, there <u>ought</u> to be more accrediting.

## WHAT IS THE FUTURE OF VOLUNTARY AGENCIES?

The present voluntary agencies, general regional accrediting bodies and specialized agencies, have been around for 30 years or more, though the

accrediting function as such is more a product of the early 1900's. The North Central Association was probably the first to develop an accrediting program as such when in 1909 it adopted its first standards for the accreditation of colleges. The Southern Association followed with a list of approved colleges in 1920. The other regional agencies subsequently also became accrediting bodies. Among the professional groups, medicine was one of the earliest to enter accrediting; the American Medical Association established a Council on Medical Education and Hospitals in 1904. The Flexner study then provided the basis for the establishment of specific requirements and standards. Dental education issued a list of approved school in 1918, the American Bar Association followed in 1923. Now some 33 professional agencies are recognized by the National Commission on Accrediting. Recently the National Commission reported on new accrediting efforts in allied health education. /cf. Reports: National Commission on Accrediting, No. XXII-2, October 1972/

As already observed, voluntary accrediting agencies are very much in the picture now. At least these agencies are exceedingly active. Parenthetically, few of us are convinced that they are voluntary, even if they are recognized as such in the eyes of the law, because the institution or program not enjoying accreditation by some agency often finds itself excluded from participation in programs or activities deemed necessary for its continued development. Will these voluntary agencies continue to be active? If so, in what way? How active will they be in the future? I think the answers to these questions depend on how the voluntary agencies respond to the current criticisms being leveled at them. By that I do not mean that they will suddenly go out of existence; they will not do so however we react in the next few years. But the influence and effectiveness

of these agencies will depend greatly upon their responsiveness to the criticisms that are being directed to them.

Let me examine some of these criticisms. I shall give particular attention to the regional agencies, because I have had more in the way of direct contact with them. Three years ago I participated as a member of a four-man team in a study of the regional accrediting agencies. We spent a year on the project, during which we had extended periods of time in the offices of the executives, interviewing people and reading reports. We accompanied accrediting teams and observed the deliberations leading to decisions on accrediting cases. We solicited comments from colleges accredited and undergoing accreditation. Out of all of this activity we produced 662 pages of findings and recommendations. In the summary written by Claude Puffer, chairman of the team, we made some eleven specific recommendations. I should like to comment on some of these, even though at this later date I may differ with the way in which we cast the earlier statements. /The team consisted of Claude E. Puffer, Professor of Economics and Vice President for Business Affairs, State University of New York at Buffalo (Director); H. Walter Steffens, former Academic Vice-President of the University of Idaho (Associate Director); John Lombardi, former Assistant Superintendent of the Los Angeles Junior College District; and Allan O. Pfnister, Professor of Higher Education at the University of Denver./

Our first and general recommendation was that the six regions develop a more unified approach to accrediting. This is one of the more obvious recommendations, because anyone who has moved between the regions has observed the differences in procedures and even the differences in criteria. We did say in the summary that "when carefully studied, however, there is

more agreement than disagreement concerning the basic fundamentals of quality necessary for accredited status." /Federation of Regional Accrediting Commissions of Higher Education, A Report on Institutional Accreditation in Higher Education, Chicago: FRACHE, 1970, p. 8/ I am not sure that I would now be quite as positive about my own assessment. That is to say, I am not sure that there was as much agreement on the basic fundamentals as then appeared. We found some variation in the approach to not-for-profit institutions, although the Marjorie Webster case was forcing each of the commissions to rethink its stance. The concepts of "Correspondent" and "Recognized Candidate for Accreditation" differed significantly in terms of criteria applied and evaluation procedures employed. One region was going through what was almost as demanding an examination as a full scale accrediting visit. Some other regions, while adhering to a general statement of the Federation were much more casual in approach. The concept of "preliminary accreditation" was not universally accepted, nor accreditation by degree level, so-called program accreditation.

But I need not further document the differences. It seems to me that the differences were real and significant. Incidentally, a fascinating study of the evolution of differences in the approaches of two regional accrediting agencies was made by Mary Wiley and Mayor Zald some five years ago. /M.G. Wiley and M.N. Zald, "The Growth and Transformation of Educational Accrediting Agencies: An Exploratory Study in Social Control of Institutions," Sociology of Education, 41 (Winter 1968), pp. 36-56/ The two researchers traced the developments in the two agencies and documented the way in which significant differences in approach developed within these agencies. The authors also noted, among other things, that "as a mechanism of social control, accreditation is probably less

meaningful today than it once was." /Wiley and Zald, op. cit., p. 567

Perhaps as a result of our year-long study and our recommendations the six regional agencies have moved toward a stronger Federation. Since September 1, the Federation of Regional Accrediting Commissions of Higher Education has had a full-time director, Robert Kirkwood, and an office separate from any one of the agencies, in Washington, D.C. The Federation has also authorized, under the former director, Norman Burns, a study for the development and improvement of accrediting procedures. The Federation recently sponsored an inter-regional cooperative evaluation of selected study abroad programs. All of the signs point toward a more unified and national approach to general accrediting. We should expect to see more agreement among the regions on the development of criteria, more consistency of accrediting philosophies and practices, more overall supervision of accrediting procedures from region to region. And these points represent the first three of our 11 recommendations.

But simply creating a set of criteria and procedures that are consistent on a national basis will not be enough. We could have even more of what Samuel Capen feared in his comments on the standardization of institutions. We could now have standardization on a national rather than on a regional level. What we meant to say in the FRACHE study commission, or what I think we meant, is that we were disturbed that variations in criteria and procedures seemed to be regionally determined. In the 1970's we could not see how regionalism could be legitimate basis for such variation. But we were not asking for a single, all encompassing national set of standards and procedures. I think that the more we looked at the accreditation process, the more we saw the need for variation in standards and procedures, but we wanted this variation on some basis other

than geography. Our fourth recommendation, accordingly, called for the development of a significant research activity under the aegis of the Federation.

> The new national organization /[a reorganized federation]/ would have the opportunity and obligation to engage in research in the whole area of evaluation and accreditation of institutions of higher education. It could study questions of how to evaluate more fully the educational effectiveness of colleges and universities. What are the right questions to ask institutions? What new techniques can evaluators adopt to meet how effective educational programs are, and how well they meet the purposes and objectives of the institution? How well does the self-study process enable an institution to evaluate the effectiveness of its own educational program? /A Report on Institutional Accreditation in Higher Education, p. 10/

If the voluntary agencies, especially the general agencies, are to be viable at a time when so much of what we do in education is up for question, they are going to have to engage in searching, re-examination of their criteria and procedures, and they are going to have to engage in the kind of research that tests both criteria and procedures. The problem in higher education generally seems to be that at a very time when a great deal more flexibility is demanded in the educational process, as a reaction to some of the pressures of the sixties we may be inclined to become more inflexible and set in our ways. If the new structure of the Federation means the development of more rigid approaches to accreditation, a single set of criteria and a single approach, the last state will be worst than the first.

If I remember my ancient history well--and I recently browsed through Bowra's The Greek Experience, one of the most creative periods in Greek history was during the day of the strong independent city states:

> The unity of the Greeks contained a great diversity of local variations. If Athens and the cities of Ionia were the most adventurous and enterprising, Sparta and its kindred island of Crete clung most tenaciously to the traditions of the past.

> But Athens did not take any less interest in its own legends and ceremonies, or Sparta, in the 6th and 7th centuries, failed to develop a gay and charming art in metal, iron, and pottery. In the middle of the 6th century the island of Samos was in the van of mathematics, engineering, poetry, and sculpture.... The merchant princes of Aegina and Corinth were generous patrons of the arts, and even in sluggish Boeotia there was a time-honored tradition of local song.... Systems of government varied from place to place, and comprised hereditary monarchies, landed aristocracies, mercantile oligarchies, and aggressive democracies. /C.M. Bowra, The Greek Experience, New York: The New American Library, a Mentor Book, 1957, p. 30/

But I also seem to remember that the city states fell into conflict. The Peloponnesian War was a civil and international war that had disastrous consequences for a rich culture.

> Because of its competing claims men forgot their respect for law, for the family, for the gods, for the city. The balance on which Greek civilization was so delicately built was broken, and the spirit of personal ambition, nursed in an atmosphere of grievance and conspiracy, came naked to the surface. /Bowra, op. cit., p. 94/

I must not overdo the analogy, because I do not see the various accrediting agencies engaged in quite that kind of war. Nonetheless, unless the Federation can maintain both unity and variation (variation on other than regional bases), the role of the voluntary agencies will be less significant in the future. Voluntary accreditation will be subject to even more attacks.

As a subpoint under this discussion of criteria and procedures, may I comment on what seemed to be one of the major issues in regard to accreditation at a meeting of this same association a year ago, namely that accrediting, especially that of the regional agencies, stifled creativity, prohibited experimentation, and in other ways was managing to drag us all down into dull, drab conformity. At that meeting, and in the printed documents, and in speeches, before and after, the executives of the voluntary agencies (general as well as specialized) avowed that

accreditation did not discourage innovation. The Annual Report for 1971 of the North Central Association is replete with such statements as the following:

> The Commission believes that institutional growth and development which eventuate in lasting educational improvement must come from within institutions through introspection and self-study. This central concept which guides the Commission on its relationship to institutions puts a premium on institutional dynamism, creativity, and mature processes of educational planning....
>
> The role the Commission has assumed is not an easy one. For one thing it requires continuous review of its evaluative activities to insure their appropriateness, applicability, and validity. It has discovered that the task of stimulating institutions to respond creatively to changing and emerging needs is more difficult than might be anticipated....
>
> ...higher education is breaking out of its structural bonds. Bold new ventures which do more than modify old structures are upon us--ventures truly innovative in their rejection of old patterns. The Commission believes that a newer and broader base for education is emerging and that new structures, new modes of teaching and learning, and other types of arrangements will be initiated, developing within or alongside the more traditional educational institution. The Commission has underway plans for revising its procedures and evaluative techniques in a fashion consistent with the new developments....
>
> Another issue of concern at the meeting was the approach to evaluation of emerging forms of so-called 'non-traditional' patterns of study and various institutional and structural arrangements for this purpose.... The philosophy of the Commission is that the accrediting process should be adapted to accommodate a variety of forms of educational activities. /North Central Association of Colleges and Secondary Schools, Annual Report 1971: Commission on Institutions of Higher Education, Chicago, NCA, 1972, pp. 2-6/

Yet we continue to have horror stories in which the evidence seems to be that institutions trying new approaches are told in no uncertain terms by a visiting team that they are far out of line. What is actually happening? Probably both those who are complaining and the accrediting agencies are correctly reporting their experiences. It is correct that the official word from the agencies is that the agencies favor experimentation. It is also correct that at some point in the practice the principle

seems to be lost. Sometime I should like to do a series of case studies in which innovative programs have been reviewed and find out just what happened and why.

I expect that I would find both invitation and examining team seeing the experience in different perspective. I am again and again surprised in my own examining experience to find that often a college will seek to show how traditional it is, when it ought to be and is able to undertake some significant innovation. On a recent examination, after we had broken down some of the initial caution that always seems to be present early in such a visit, we asked the college why it was not exploiting some its potentials for innovative approaches. We were told that the college was consciously playing it safe until it was accredited; then it might try to do something different. Now it is probably an open question as to how amenable the college really is to experimentation, but that the perception of the college was that accrediting required reaching for the lowest common denominator is significant. Pronouncements by accrediting agencies executives apparently do not make institutions think differently.

Perhaps what is operating is something similar to what occurred recently in one of my graduate seminars. The class had just finished attacking with great gusto the lack of imagination and insensitivity to the winds of change in some of the more recent national reports on higher education. I then invited to talk with the group the president of a new institution, one that was just aborning. He had an office, some faculty scattered throughout the region, and he said he would put together classes or learning units for one, ten or twenty-five or more students, would grant credit, and even provide certificates and degrees. He had hardly finished his introductory remarks before one member of the class after another was

attacking him for running such a slipshod diploma mill. Questions of control, standards, evaluation flew at him.

My guess is that the typical examining team simply is not equipped to deal with the new and the unusual. And my guess is that all too many experimental programs are really not very carefully thought out. Put these two ingredients together, and conflict is inevitable. The examiners are unwilling to accept something as being good just because it is new and exciting, and the college can't understand why the questions all seem to be based on a non-sympathetic and traditional approach. The examiners' report as later submitted then raises all sorts of questions about the quality of the program. The college subsequently reacts that the team is incapable of understanding a creative enterprise.

If there is a breakdown in the voluntary accrediting process, it is in the training and perception of the team and the inadequate preparation--and I don't mean there is a lack of volumninous reports--of the college. One of our graduate students undertook a study of the training process used by several accrediting agencies, and what he found was far from encouraging. /Gerald C. Baysore, The Selection, Training, and Evaluation of Examiners in Selected Accrediting Associations, unpublished Ed.D. thesis, University of Denver, 1971/ He had some difficulty at first in getting some gunshy executives to discuss the matter. When he did break through the initial reluctance, he found that with very few exceptions there was virtually no formal preparation for those who acted as examiners. The assumption seemed to be that any person from any reasonably good institution or program could evaluate any other program. It seems to me that this assumption needs some re-evaluation. The scene is not all dismal; there are underway some fairly substantial training

programs, but these bright spots are easily lost in the fog that covers most of the activity.

And the institutional self-study reports are not always that good, whether prepared for general or specialized institutions. While most institutions point to the self-study as the single most important part of the accrediting process--those we queried for the FRACHE study overwhelmingly cited the self-study as the most important outcome of accreditation--too many of the self-studies are elaborate documents of self-justification. Institutions are overly public relations oriented, even in the accrediting process, and they do not know how to engage in critical self-study. They aren't tooled up to do that kind of job. They hastily organize--because they are told to do so or think they are told to do so--a self-study committee and produce hundreds of pages of slanted description.

In fairness, I must recognize that beleagured presidents and deans become weary of self-study when they are increasingly involved in trying to keep the roofs on and the doors open. As one writer observes, self-study is itself a time-consuming task:

> A self-study is a time-consuming task with greater potential for redirection and improvement of an institution. It is not likely to be effective if severely constrained in time and primarily completed to meet an externally imposed requirement. The self-study, under these circumstances, tends to become a historical record, a survey of current status, or a study limited to consideration of one of several pressing issues.... The self-study must be completed with a sufficient lapse of time prior to the accreditation examination to permit determination of the extent to which plans developed in the self-study have put into practice. /Paul L. Dressel, "Accreditation and Institutional Self-Study," North Central Association Quarterly, Vol. XLVI (Fall 1971), p. 287/

Paul Dressel goes on to say that much self-study is a wasted effort unless it serves as an agent for change.

Without better training for team members and better insight into self-study, voluntary accreditation is, to use William Selden's earlier phrase, more and more "relatively unimportant."

There are many more aspects of this general criticism of accrediting criteria and procedures that ought to be discussed--for example, whence the criteria? Where did they come from? What empirical bases do they have? But let me turn to one last type of criticism. How do accrediting agencies serve the public interest? In what ways are they accountable to the general public? Several of our recommendations in the ERACHE study were related to this matter of accountability. We said that a reorganized federation "would have an opportunity to create closer ties or relationships with the public." /A Report on Institutional Accreditation in Higher Education, p. 11/ But we hedged in that we said that the commissions "have had a sound reason to refrain from having public or non-professional representatives in their membership." (I am not sure at this point whether I would wholly agree with this portion of our earlier statement.) We went on to comment in our sixth and seventh recommendations on the need to develop a better appeal procedure and we said that the various agencies would have to give more attention to broadening the scope of institutional accrediting.

But the critical issue is that of determining how the voluntary accrediting agency, both general and specialized, will be able to relate more effectively to the general public. The issue is pointed up in a statement by Stephen Romine:

> For many years these same higher institutions have supported and engaged in another form of self-imposed accountability or responsibility, namely, voluntary regional accreditation. Administered through six associations encompassing the fifty states, the aim of accreditation has been effective and

> efficient collegiate operation. Across the nation, such accreditation has long been considered a generally sought and accepted hallmark of quality.
>
> The emergence of the new accountability not only asserts that something is wrong with higher institutions; it also implies that the warrantee of accreditation is subject to question. If accreditation as conducted by the regional associations is to retain its significance, it must be responsive to this accountability. It must also be mindful of other groups that are increasingly serving as agents of accountability, such as boards of trustees, state coordinating commissions, legislative bodies, and the executive branch of state government.... In each state they are closer to the people than the regional accrediting associations, and they are generally less suspect and more representative of the local expectations, needs, and pressures. /Stephen A. Romine, "Accreditation and the New Accountability in Higher Education," The North Central Association Quarterly, LV (Fall 1971), p. 257/

A year ago the accrediting agencies were accused of being private clubs. I am not at all sure that they can be called private clubs, because they are not all that exclusive; the membership in any one region certainly includes most accreditable institutions. Perhaps the professional agencies are somewhat more restrictive, but in terms of numbers of members accrediting is far from conferring membership in some exclusive club.

Yet the voluntary accrediting agencies are private in that they have been oriented primarily to their own membership. They have often stated that the primary purpose of accrediting is to help member institutions to improve educationally. This has been true of specialized as well as general accrediting agencies. And while it may be contended that by helping member institutions improve, accrediting agencies are serving the general public, the lines of communication within the groups have been more clearly drawn between the agencies and the member institutions than between the agencies and the general public.

While all of the accrediting agencies have provided in one form or another a list of approved institutions for the general public, the

publication of such a list has not been viewed as a primary function of an accrediting agency. But now that these lists are used by the general public, nationally and internationally, the meaning of the lists is coming under scrutiny. The list is being used by the Federal Government--about which I want to say more later--for determining eligibility for funding. Pressures are building to make the function of reporting to the public a more important one. The general public, now that most colleges have achieved some form of accreditation, want something more than simply a list of institutions that have achieved this status. The public wants some indication of level of quality, wants to know which institutions are more equal among equal institutions. Some observers have even suggested that accrediting agencies have moved into the realm of becoming public utilities, even if privately operated, and they have the responsibility of protecting the public in a way that places them in the position of being more accountable to the public. If public accountability increases in significance, and it seems unquestionable that it will, the orientation of the accrediting agencies may shift significantly. The manner in which the criteria are established and the way in which the criteria are applied increasingly may come under public scrutiny.

The agencies are not quite sure how to deal with this problem of rendering account. One response has been to work toward better information dissemination. It is felt that if the agencies can inform the public more effectively on what they are doing and how they are doing, some of the public's concerns will be met. But accountability is more than providing more and better information. Accountability soon develops as a two-way process.

The public is likely to want more direct input into the operation of the agencies as it becomes better acquainted with how the agencies operate. In the report for FRACHE, drawing from a court case in which the key issue was the expertise of the examining committee--they were professionals practicing in a professional way--we found it difficult to see how teams could include "public" members. I still doubt that examining teams as such should include public members, but at some point there needs to be and there will be more public involvement. Recently the Federation of Regional Accrediting Commissions of Higher Education announced that six persons had been appointed as public members of the policy-making body. Included in the group were persons drawn from manufacturing, marketing, law and an educational association.

The dilemma the accrediting agencies face is on the one hand preserving what seems to be a professional function and on the other hand involving the non-professional in examining the function. In a sense, only the professional knows what to look for. It is the physician and the lawyer and the professor who ought to know what is involved in preparing persons for those professions. On the other hand, the professional can be blind to needed changes within the profession. When Wilhelm von Humboldt assumed direction of the Prussian school system, in his opening address he emphasized that teachers and pupils should cooperate in the promotion of knowledge:

> The former is not for the latter, both are for science; his occupation depends upon their presence, and without them it will not thrive; if they did not voluntarily gather around him, he would seek them out in order more readily to achieve his goal by combining a practiced mind, which is on that very account apt to be more one-sided and less active, with one which, though weaker and still neutral, bravely attempts every possibility. /Quoted by Friedrich Paulsen, The German Universities and University Study, New York: Charles Scribner's Sons, 1906, p. 53/

Again, I cannot press the analogy too far, but it is in von Humboldt's comment that the practiced mind is apt to be more one-sided and that it needs another mind to challenge that the role of the public in the professional activity of accrediting must be brought to bear. With more exposure of procedures to the public and more input from the public accrediting agencies also open themselves to all of the attendant dangers in involving greater numbers of people with varying opinions in establishing policies. Yet, the viability of the voluntary organizations will, I think, depend upon the extent to which they are able to work out this relationship.

What will be the future of voluntary accreditation? One can give only an "iffy" kind of response. The study by Wiley and Zald suggests that as a mechanism of social control accreditation is probably less meaningful today than it was at an earlier date. But accrediting agencies are still very much alive. But how viable the contribution will be in the future will depend to a great extent, I believe, on how effectively the agencies can meet these challenges. Accrediting is at a crossroads. /cf. Allan O. Pfnister, "Regional Accrediting Agencies at the Crossroads," Journal of Higher Education, XLII (October, 1971), pp. 558-573./

## IF NOT BY VOLUNTARY ASSOCIATIONS, THEN BY WHOM OR WHAT?

If accrediting were not to continue primarily as a function of private and voluntary agencies, then what are the options? The options, it would seem, are rather limited. We would have to go to some governmental or quasi-governmental agency or agencies. On more than one occasion it has been suggested that accreditation be turned over to the federal and/or state governments. Indeed, it seemed that the Second Task Force in its preliminary report was openly avowing such a transfer of responsibility. More recently,

however, Frank Newman, chairman of the group, has been saying otherwise:

> We have thus proposed that HEW distinguish eligibility criteria and procedures from accrediting criteria and procedures, to recognize organizations, including accrediting agencies--willing to apply these criteria as opposed to accreditation standards, establish a commission to hear appeals of eligibility denial, and require institutions to publish SEC-type prospectuses as a form of consumer information. Thus we seek not to federalize accreditation, but merely to limit the federal involvement. (Frank Newman, "A Preview of the Second Newman Report," Change, IV, May 1972, p. 33)

Mr. Newman is referring to the action of Congress is 1952 which in effect delegated to accrediting agencies the authority for determining eligibility for various forms of federal aid. As I have already noted, the Brookings Institute is just getting underway at the request of HEW its study of the government use of voluntary accrediting agencies for determining eligibility.

What if the federal government were to become more directly involved in accrediting, i.e., more directly involved than through determining eligibility for funding? At one point the Government almost did assume a major role in evaluating colleges and universities. Beginning with the first Commissioner of Education, Henry Barnard, the United States Department of Education published reports on higher educational institutions that included a good bit of evaluative material. Barnard indicated that he intended to provide information of this sort in his reports and "in the absence of formal standardizing or accrediting of collegiate institutions by public or private institutions, the information assembled and published by Barnard and his successors offered the only basis for comparing on a nation-wide scale the numerous higher educational institutions." /Jennings B. Sanders, "The United States Office of Education and Accreditation," Accreditation in Higher Education, Washington, D.C.: U.S. Department of Health, Education and Welfare, 1959, p. 15/ Commissioner Elmer Ellsworth Brown (1906-11) in his report of 1908 referred to the necessity of some

kind of "standardizing" of American higher education.

In 1911, with an appropriation from the previous year for the appointment of a specialist in higher education, the Bureau of Education, as the former Department of Education was then designated, established a division of higher education. The first specialist, Dr. Kendric C. Babcock, with the assistance of the Association of American Universities, compiled a classified list of colleges. The colleges were grouped according to four classifications, depending upon the records of their graduates in advanced study. The galley proof of the list came to the attention of the public press, opposition developed against the way in which certain institutions were classified, and President Taft directed the Commissioner to withhold publication. The following year, with the inauguration of President Wilson, the Association of American Universities, one of the moving forces in getting the Bureau of Education to compile the list in the first place, asked that the list be published, but the list was never released.

At its Annual Meeting March 20-21, 1914, the North Central Association of Colleges and Secondary Schools heard for the first time from Samuel P. Capen, then specialist in higher education in the Bureau. The same Samuel Capen who 17 years later asked for a discontinuation of all accrediting practices at that meeting prompted the Association to pass several resolutions, among them the following:

> Resolved, That the North Central Association of Colleges and Secondary Schools considers it desirable that the Bureau of Education shall publish from time to time a classification of colleges and universities with reference to their standards and equipment. /Proceedings of the Nineteenth Annual Meeting of the North Central Association of Colleges and Secondary Schools, held at Chicago, Illinois; March 20-21, 1914, Chicago: The North Central Association, 1914, p. 119/

And the Association went on to appoint a representative to serve on a committee which was to include several other regional and national educational groups to cooperate with the Bureau in preparing such a list. When the committee met in 1914 as the "Committee on Higher Educational Statistics" it soon found that a number of its members had come with definite instructions to oppose any qualitative classification system that might be proposed. The upshot of it was that the Bureau agreed to collect, tabulate, and present data in a neutral form that would allow colleges and universities to make their own classifications. Samuel Capen directed the project.

When Capen later reported on "College 'Lists' and Surveys Published by the Bureau of Education," he said that the implication was "that the United States Government has from time to time sought to standardize or rate the colleges of the country" and "perhaps in a certain sense this is true," but he wanted to make clear that the present intent was otherwise. He traced the development of the data gathering and the sometime classifying function of the Bureau and concluded by saying that the present (1917) activities were anything but classifying or accrediting in nature:

> None of these activities directly help the persons who want critical determinations of the degree of recognition particular colleges should receive. Probably the Bureau will do nothing in the near future to lend such persons direct aid and comfort. I do not foresee any government rating of colleges which can be used as the scape goat to relieve the officers of institutions and associations of painful decisions. /Samuel P. Capen, "College 'Lists' and Surveys Published by the Bureau of Education," School and Society, Vol. 6 (July 14, 1970), pp. 35-41/

In subsequent years the Office of Education remained firm in its role of reporting data, providing directories, making studies, and in 1959 Jennings Sanders was safe in writing:

> The Office of Education is an advisory, consultative, and research office for all levels of education.... That it is not a rating, standardizing, or prescriptive agency for education at any level is not well understood.... /But/ it should be clearly understood at this point that the Office of Education does not accredit schools and colleges nor does it seek to do so. Furthermore, there is obviously no reason why it should perform this function which is now performed by state and voluntary agencies. /Jennings B. Sanders, op. cit., p. 21/

Yet with the passage of the Veterans' Readjustment Assistance Act (G.I. Bill) in 1952 a new element was injected.

The G.I. Bill and subsequent legislation referring to funding of college programs required that the Commissioner of Education "publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by educational institutions." /Federal Register, Vol. 34, No. 11--Thursday, January 16, 1969, p. 643/ Participation in various federal funding programs was to be based on some form of certification. The route taken by the federal government was to make use of the lists published by accrediting agencies rather than for the government itself to enter accrediting. Then in 1958 the National Defense Education Act extended eligibility beyond accreditation if the Commissioner found that the institution was making an effort to meet accreditation requirements and in a reasonable time might be expected to reach accredited status, or if credits were accepted by at least three accredited institutions. The law also provided that if there were no established agency for the accreditation of a particular category of colleges or programs, the Commissioner could make use of an advisory committee to set standards and determine eligibility for federal funds. Faced with an increasing work load and with increasing pressures from institutions not covered by existing accrediting agencies, the Office of Education created in 1968 the Office of Accreditation and Institutional

Eligibility. The new office serves the entire Office of Education and some of the other federal agencies which are involved in higher or vocational education. The staff consists of an Accreditation Policy Unit and two Institutional Eligibility Units, one for higher education and one for vocational education. The function of the Eligibility Units is to determine the eligibility of individual colleges, universities, and vocational and technical schools for federal construction aid, student assistance, and other forms of federal funds. The Office also works closely with the existing accrediting agencies and certifies their authority to serve in turn as certifying agencies for federal programs.

The provision in the G.I. Bill requiring the Commissioner to publish a list of nationally recognized agencies and the provisions in subsequent legislation for establishing eligibility by demonstrating progress toward accreditation or through approval by an advisory committee, and the establishment of the Office of Accreditation and Institutional Eligibility brought the federal government and voluntary accreditation in closer contact then even the participants in the initial stages may have realized. The accrediting agencies found themselves taking on a quasi-governmental function, even creating new levels of accreditation such as "correspondent" and "recognized candidate for accreditation"--though strictly speaking neither designation implies accreditation--and the federal government through the Office of Education found itself making accrediting-type decisions and through the Office of Accreditation and Institutional Eligibility increasingly establishing standards for the accreditation agencies themselves.

In the meantime most of the states have been involved to a greater or lesser degree in forms of accreditation. Established in 1784, the Board of Regents of the University of the State of New York was the first state

agency to take on responsibility for certifying institutions and programs. Many state departments of education have been given the responsibility for accrediting institutions and programs within the state borders. The number of states carrying on such accrediting activities has, however, decreased in recent years.

Thus, both the federal government and the individual states are to some degree already involved in accrediting colleges and universities. Some will argue that the federal government is not really engaged in accrediting. In a strict sense they are perhaps correct, but in reviewing programs and in establishing criteria for recognizing accrediting agencies and associations the government does in fact, it seems to me, engage in accrediting-type, if not accrediting activities. Criteria proposed by the Office of Accreditation and Eligibility contain a number of fairly specific requirements for accrediting agencies that are to be recognized.

And voluntary agencies, especially regional accrediting commissions, have in a sense served as agents of the federal government in developing such categories as "correspondent" and "recognized candidate for accreditation" to the extent that those categories serve to open the door for otherwise non-eligible institutions and programs to secure federal funds. By using the accrediting agencies' lists for establishing eligibility, the USOE is in effect using the voluntary agencies to solve its problem of establishing eligibility of institutions.

Shall we then recognize that the federal government is already so much involved in accrediting that we should simply turn over the entire function to some federal office? Some have argued that such a move would be impossible for practical reasons. The Office of Accreditation and Eligibility would have to employ an enormous staff if it were to review every

institution in the country applying for funds. Indeed, if the federal government assumed responsibility for accrediting it would have to review not only institutions applying for funds, but it would have to carry on virtually the same wide-ranging activities now carried on by the regional agencies. Of course, the federal government could simply take over all of the regional and professional staffs now existing or create regional and professional staffs equal in size to the present establishment. There would also have to be continued input from the hundreds of volunteers who serve on accrediting teams and the scores of committees of the voluntary agencies. In any event, I do not see much chance of reducing the number of personnel appreciably; the several regional offices are already hard pressed to maintain services with present personnel. The logists would be formidable, but considering existing federal bureaucracies, the job would not be impossible.

The question that is more important is whether we would be any better off substituting a single fairly large government bureaucracy for the several smaller private and voluntary bureaucracies now operating. Frank Dickey and Jerry Miller, addressing themselves to this issue, begin by noting that "The use of accreditation status by government is so extensive that there exists virtually no possibility of a complete pull back, even if such were desirable. /Frank G. Dickey and Jerry W. Miller, "Federal Involvement in Nongovernmental Accreditation," Educational Record, 53 (Spring, 1972), p. 141/ This creates enough of a problem for accreditation, but for the federal government to assume more direct involvement in accrediting would, according to Dickey and Miller, create even greater problems:

> Growing federal control over accreditation carries with it the potential for considerable control over educational practices and standards. This violates the traditional role of the federal government in education if not its constitutional authority....
>
> /Greater federal involvement/ multiplies the potential for exerting direct control over institutions and their programs and creating a monolithic system of postsecondary education. /Ibid., p. 141/

The two writers see the development of voluntary nongovernmental accrediting as "an extension of the balance-of-power concept" which has prevented the development of "a monolithic postsecondary educational structure susceptible to control by narrow interests." /Ibid., p. 141/ From the points of view of Dickey and Miller, even if it were possible to develop the bureaucracy, to place accrediting within the federal structure raises the spectre of a monolithic system of postsecondary education with sufficient force to persuade us that some other option is desirable. But what guarantee do we have that the national private and voluntary associations will not create their own monolithic system?

I suppose that in the long run we have no guarantee that any particular form of accrediting will prove most effective in dealing with the issues at hand. Yet the experience of 1911 suggests how much more susceptible to political winds a federal agency may be. And while voluntary agencies may be accused of not moving rapidly enough, they are not unmindful of outside pressures. Indeed, the creation of the Federation of Regional Accrediting Commissions of Higher Education and the inauguration of studies of procedures and criteria, even now underway, are indications of potentials for change. Social pressures and pressures from the membership of the agencies themselves are not ineffective.

But lest I be accused of taking the easy way out by seeming to accept the status quo, let me emphasize again that significant effort is needed among the voluntary agencies in achieving a balance between the establishment

of valid general standards and the development of much more flexibility in criteria and procedures to deal with the new approaches to education, that more effort is needed in developing much better ways of training accrediting teams, and that new ways must be found for balancing responsiveness to the public with the need to maintain professional expertise. In relation to the federal government, there seems to me to be clearly a need for separating the process for determining eligibility for federal funds from the accrediting process. Rather than have accrediting agencies in effect certifying eligibility and in the process thereof enforcing federal regulations--as one draft of the new criteria of the Office of Accreditation and Eligibility might suggest--the federal government should use the lists of accrediting agencies where applicable to establish some initial level of quality, then through its own questionnaires and schedules determine if federal regulations in other respects are met. If this task appears to be too large for the federal offices as now constituted, then contract with existing or new agencies to have the eligibility investigations to be undertaken. But keep the process for establishing eligibility separate from the process of accreditation. And for programs now covered by accrediting agencies, encourage the general agencies to broaden their scope of activities--they are already reaching out to a broader range of programs than they would have examined a decade ago--and perhaps encourage them to develop new categories of institutional types.

(Draft report--some portions will be revised and/or expanded in final presentation. 11/15/72)